1	THE THATER LAW GROUP, P.C. M. LANI ESTEBAN-TRINIDAD			
2	Nevada Bar No. 006967			
	6390 W. Cheyenne Ave., Ste. A			
3	Las Vegas, Nevada 89108 Telephone: (702) 736-5297			
4	Facsimile: (702) 736-5299			
5	Attorney for Plaintiff,			
6	KAREN MCCLURE UNITED STATES DISTRICT COURT			
7	DISTRICT COURT OF NEVADA			
8	KADENI MaCI LIDE an individual.			
	KAREN McCLURE, an individual;) Plaintiff,)			
9	vs.) Case No: 2:15-cv-02423-APG-CWH			
10	DELTA AIR LINES, INC., a foreign corporation,			
11	DOES 1 through 10 inclusive; ROES)			
12	CORPORATIONS/ENTITIES 1 through 10)			
	inclusive,) Defendants.)			
13				
14	STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO			
15	DEFENDANT'S MOTION TO DISMISS [FIRST REQUEST]			
16	Plaintiff KAREN McCLURE (hereinafter "Plaintiff") and DELTA AIR LINES, INC			
17	(hereinafter "Defendant"), by and through their respective counsels of record, hereby stipulate and agree			
18	to extend the time for Plaintiff to respond to Defendant's Motion to Dismiss for Improper Venue, or in			
19 20	the Alternative, to Transfer Venue to the United States District Court for the Northern District of			
21	Georgia, Atlanta Division, up to and including February 26, 2016.			
22	This extension is necessary to provide adequate time for Plaintiff to receive and review necessary			
23	information in order to respond to Defendant's Motion to Dismiss for Improper Venue, or in the			
24	Alternative, to Transfer Venue to the United States District Court for the Northern District of Georgia			
25	Atlanta Division. This is the first request for an extension of time to respond to Defendant's Motion to			
26	and the second of the second o			

-1-

1	Dismiss for Improper Venue, or in the Alternative, to Transfer Venue to the United States District Cour		
2	for the Northern District of Georgia, Atlanta Division.		
3	The parties agree and represent to the Court that this request is made in good faith and not for th		
4	purpose of delay.		
5	Dated: February 12 th , 2016	Dated: February 12 th , 2016	
6	Respectfully submitted,	Respectfully submitted,	
7	THE THATER LAW GROUP, P.C.	FISHER & PHILLIPS LLP	
8	/s/ M. Lani Esteban-Trinidad	/s/ Scott M. Mahoney	
9	M. LANI ESTEBAN-TRINIDAD	SCOTT M. MAHONEY, ESQ. 300 South Fourth Street, Suite 300	
10	6390 W. Cheyenne Ave., Suite A Las Vegas, Nevada 89108 Telephone: (702) 736-5297	Las Vegas, Nevada 89101	
11	Fax: (702) 736-5299	Telephone: (702) 252-3131 Facsimile: (702) 252-7411	
12	Attorney for Plaintiff, KAREN McCLURE	Attorney for Defendant, DELTA AIR LINES, INC.	
13	DEDITITING ENGLISH INC.		
14			
15			
16	<u>ORDER</u>		
17			
18		IT IS SO ORDERED.	
19 20		Dated: February 16, 2016.	
21		and	
2223		UNITED STATES DISTRICT JUDGE	
24			
25			
26			
27			
	H		

28